

ORIGINAL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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LIJUN MENG,

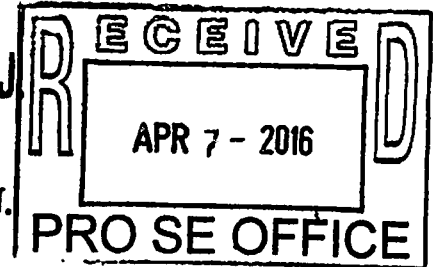
Plaintiff,
- against -

JOHN DOE #1(SERGEANT),
JOHN DOE #2(FEMAL OFFICER),
FLORIN COSTE, JOHN DOE #3,
Defendants,

DeARCY HALL, J.

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ORENSTEIN, M.J.

CV 16-01703
COMPLAINT



1. Parties:

Plaintiff LIJUN MENG, resides at 112 Bowery, #1745 New York, New York 10013.

Defendant JOHN DOE #1, employed as a police sergeant at the 62 PRECINCT 1925
Bath Ave Brooklyn, NY 11214

Defendant JOHN DOE #2, employed as a police officer (Female) at the 62
PRECINCT 1925 Bath Ave Brooklyn, NY 11214

Defendant FLORIN COSTE, employed as a police officer at the 62 PRECINCT 1925
Bath Ave Brooklyn, NY 11214

Defendant JOHN DOE #3, employed as a police officer at the 62 PRECINCT 1925
Bath Ave Brooklyn, NY 11214

2. LIJUN MENG was falsely and maliciously arrested by the Defendants that are
violated of Plaintiff's civil rights protected under 42 U.S.C § 1983, the plaintiff LIJUN MENG
experienced humiliation and physical abuse personal insults during her arrests and that the
actions taken against her violated her Constitutional Rights.

3. Plaintiff LIJUN MENG rent a room in 240 Ave P 2nd fl. Brooklyn NY, From April 1,
2015 but not live in until June 30, 2015. Mean time the only person she has meet/talked couple
of times was ZHENG, XUE who was live in for quite a while. At May 10, 2015 because Miss.

ZHENG forcibly occupy Wi-Fi(owns by landlord) infringe plaintiff's rights (free Wi-Fi included in the rent) by change password and blocked her out...the plaintiff came front of her talk out the fact in front of the others she's shamed into anger she grabbed my hair start to beats/scratching... see (Exhibit 1) the pictures #6#7#8#9#10 done by her, then her boyfriend "surprise attacked" me and knocked me out... see (Exhibit 1) the pictures #1#2#3#4#5 done by him... when I woke up saw back of a man walking away I was extremely shocked who/where the guy come from I can't even put them together and that caused losing memories and hearing problem for period of time then I called 911 I can't even give the right address... see attached "The fact"(Exhibit 2-1).

4. At about 7:30 pm May 10, 2015 the officers came who asked I don't remember but I answered: Wi-Fi then just by subjective consciousness and saw my "bloody lip" and scratch on my chest and totally destroyed T-shirt, so they(JOHN DOE #1 JOHN DOE #2 FLORIN COSTE) must "find something" on her in order to put me in to jail becoming their mission, they taking a side right of the beginning, they scrambled to crowd to her room for quite awhile then made the false report(Exhibit 2-2), left JOHN DOE #3 and I think there is another officer but I don't remember to chat with me even make joke over my suffering I said my back and neck pain... JOHN DOE #3 said I need massage... that makes me sad so I lowered eyelids for a while... and the emergency guy give me a bag of ice tell me to put in my neck/back...

I don't even know there is a female officer JOHN DOE #2 until she came out and point her (Miss ZHENG) and told everybody: she has a "scratch" on her left shoulder Unfortunately it (should be called "rub mark" it came from I pushing her back try to keep her left hand off of me) gone so soon. Then she told me to go to my room then told me to change cloth, why? She says something like you come with us or something that I understand that I am arrest too... I am the one who called the 911 for help... but... Jail is so cold I don't know I only wore short silk stuff

and slipper for summer and Miss ZHENG wore thicker clothes and shoes for the winter (she seems experienced)... and if JOHN DOE #2 took just a peek of me... (In Court's bathroom with dark lights can took 10 pictures my room with big window good lights...) but nobody ask do investigation or check me but trying find non-exist injury on her... I don't want to recall those scenes, subconscious refused avoid the fact for the past almost 11 month ... but now I had to.

When we were out, the every neighbors out there look at me I have never shamed and Humiliated in my entire life I was almost beaten to death the face swollen and may be crooked too and handcuffed... how could they do that without any consideration of objective fact regardless on physically theoretically wouldn't be fit there's no way she can "pull my hair push me on the ground" see (Exhibit 2-2) police report... I am over 140 lb. and she about 40lb less I am much taller bigger strong than her and I am a life and I practice qi gong I use qi gong to reduce the pain and re-heal myself I don't take any pills or anything for over 20yers that why I don't want to go to hospital... in the jail my eyes not even close for a minute all night I don't even know why I've been arrested ... I still felt the shame it's doesn't matter that I am out it's matters that I was in there... I have to swallow it... I never look/talk to no one after I moved in, I can't lift up heads I had a smirch I keep so clean in my whole life... I watch myself every steps... but now... it's nightmare but continues... I have to face it recall the horrible moment and the details.

When I get inside of car I saw the "Guy" outside play his phone I told JOHN DOE #1 it's him who beats me, he said you didn't. I told 911 it's a guy who beats me I didn't know have to repeat nobody ask me, "You can't report, you didn't see his face". Yes I never saw him before in my life but he is only man in the house first and second the body shape I saw... and he has relationship with her and they (officers) are all with him in her room... then he called him

getting closer then chat with him like friends, my heart is getting cold and sinking... the house is only few minutes away from the 62 PRECINCT but it seems took couple of hours to get there... the road is clear but the driver FLORIN COSTE who's working on the computer whole this time like Cow car bumps they finally found a women who been arrested before on some corner then chat with her for quite awhile...they all knew my back pain and my neck and handcuffed deeply cuffed my sink too... is painful to recall, that's my punishment for what I was asking... in their jail they saw the "Guy" sending food & water to both of us they knew it was wrong and even after the day 5/11/2015 I went back to get my keys the JOHN DOE #1 still told me "can't report" even saw my horrible arm with the other woman officer in the office. After I received the police report I went to 62 precincts 3 following days (I forgot exact the date) looking for the person name (FLORIN COSTE) on Report want to give to him "The fact" that I wrote particularly for what he wrote in report but unlucky 3 times later I give up.

This is not simple mistake but malpractice, if it was there's many times to correct and I ask for it too but JOHN DOE #1 wouldn't let me deliberately let go of "criminal"... I have many chances to catch that "Guy" if he let me report but... is JOHN DOE #1 Ruined my hopes to get justice the nightmare going to be continues I can't even get my medical bills reimbursed (Exhibit 3). He even asked me after I back to their office to pick up the key or looking for FLORIN COSTE I forgot: "are you guys talking yet?" I was Phenomenal men can answer: my god what you know!? My life is totally destroyed by all of the Defendants first I've been blast beaten attacked almost dead in the most safe place-Home for no reason can really talk about then I called the people who I trust the most then what they bring to me the disaster, put me in to the jail instead... I don't even have the right to report ... my life has changed forever; sense of security is gone... I can't eat will can't sleep day after the day from it happen. I called 911

because I am in danger when they came I felt safe smiling to them... now the smile is gone... the plaintiff deeply emotionally injured by the Defendants.

5. Remedy. Plaintiff LIJUN MENG Suffered serious personal injuries and severe emotional sufferings from the aforesaid acts by all of the Defendants. It affected her normal activities and constituted a violation of her civil rights and caused lack of sleep, headaches, nervousness, emotional pain and suffering and has in the past and will continue in the foreseeable future all to her detriment, loss and damages of \$1.1 Million Dollars.

WHEREFORE, Plaintiff demands judgment against the Defendants as follows:

For all the Causes of Action, compensatory and punitive damages from each individual Defendant listed below:

- a. JOHN DOE #1 \$500.000.00
- b. JOHN DOE #2 \$300.000.00
- c. FLORIN COSTE \$200.000.00
- d. JOHN DOE #3 \$100.000.00

Total of \$1.1 Million Dollars, plus interest from May 10, 2015.

For such other and further relief as this Court may deem just and proper.

New York, New York

April 7, 2016

Respectfully submitted,


LIJUN MENG
Pro Se

